

JEFFREY F. BARR, ESQ.
Nevada Bar No. 7269
ASHCRAFT & BARR | LLP
9205 West Russell Road, Suite 240
Las Vegas, Nevada 89148
(702) 631-4755

Bradley Bodamer (pro hac vice)
GRAVES GARRETT LLC
1100 Main Street, Suite 2700
Kansas City, Missouri 64105
Telephone (816) 256-3181
bbodamer@gravesgarrett.com
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

COMMUNITY SCHOOL
INITIATIVE, and LEX TECNICA,
LTD

Plaintiffs,

vs.

VANGUARD FIELD STRATEGIES,
LLC, and AXIOM LLC,

Defendants.

No.: 2:23-CV-00069-APG-EJY

STIPULATION/REQUEST
TO RE-SCHEDULE HEARING
[ECF No. 99]
ON DEFENDANT AXIOM'S
MOTION FOR SUMMARY
JUDGMENT [ECF No. 76]

(First Request)

IT IS HEREBY REQUESTED, STIPULATED AND AGREED between the parties that the hearing date on Defendant Axiom's Motion for Summary Judgment, [ECF No. 76] currently scheduled for March 13, 2025, be re-scheduled to a date and time convenient for the Court that **on or after March 24, 2025**. This Stipulation/Request is the first request for an extension and is based upon the following:

1. The Hearing for is currently scheduled for March 13, 2025 at 10:30 a.m.
2. Serious medical issues, which can be further discussed confidentially with the Court should the Court require additional information, preclude Lead Counsel for Defendants, Brad Bodamer, from attending the Hearing.

3. A brief, 10-day continuance would permit Defendant Axiom to substitute counsel, Aaron Craig, Esq., to apply for pro hac vice admission to this Court and attend the hearing.
4. The parties enter into this joint request/stipulation at the request of Defendants' Counsel.
5. Plaintiffs' Counsel agrees to the hearing being re-scheduled.
6. As such, the parties respectfully request that the hearing be re-scheduled to a date that is convenient for the Court on or after **March 24, 2025**.

DATED this 5th day of March, 2025.

TAKOS LAW GROUP, LTD.

ASHCRAFT & BARR | LLP

By: /s/ Zachary P. Takos
ZACHARY P. TAKOS, ESQ.
Nevada Bar No. 11293
10785 W. Twain Avenue
Suite 224
Las Vegas, Nevada 89135
Attorneys for Plaintiffs

By: /s/ Jeffrey F. Barr
JEFFREY F. BARR, ESQ.
Nevada Bar No. 7269
9205 West Russell Road
Suite 240
Las Vegas, Nevada 89148
Attorneys for Defendants

ORDER

IT IS ORDERED that the hearing on March 13, 2025 on Defendant Axiom's Motion for Summary Judgment [ECF No. 76] shall be re-scheduled to March 25, 2025 at 10:00 a.m. in LV Courtroom 6C.

IT IS SO ORDERED:

Dated: March 7, 2025



ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE